

U.S. Department of Justice



*United States Attorney
Eastern District of New York*

WMP: MKM
F.#2012R00347

271 Cadman Plaza East
Brooklyn, New York 11201

July 16, 2012

By ECF and electronic mail

Chase Scolnick, Esq.
Federal Defenders of New York, Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Robert Alexander
Criminal Docket No. 12-187 (CBA)

Dear Mr. Scolnick:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that at the trial in the above-referenced matter, the government intends to call Special Agent Ismael Hernandez of the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") as an expert witness, pursuant to Rule 702 of the Federal Rules of Evidence.

Specifically, the government intends to call Special Agent Hernandez to testify as an expert in the movement of firearms and ammunition in interstate commerce. Agent Hernandez is expected to testify that he examined the firearm and ammunition recovered in connection with this case and determined that they were manufactured outside the state of New York. Agent Hernandez's Statement of Qualifications is attached.

The government reserves the right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: _____ /s/
M. Kristin Mace
Assistant U.S. Attorney
(718) 254-6879

Enclosure

cc: Clerk of Court (w/o enclosure) (CBA) (by ECF)